

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BARBARA FORLASTRO and ROBERT G. FORLASTRO,
AS CO-ADMINISTRATORS OF THE ESTATE OF
ROBERT J. FOERLASTRO,

Case No.: 1:07-CV-3288
(RPP) (FM)

Plaintiffs,

-against-

VOIR DIRE
QUESTIONS

JAMES COLLINS,


Defendant.

1. Name, address, length of time at current residence.
2. Family status: spouse, children, other members of household.
3. Employment status: type of work, length of time at current position, previous employment. Same inquiries for spouse or significant other and other members of juror's household and immediate family. (If proposed juror is unemployed, length of time without work; inquiry as to whether unemployment is based upon a physical condition. If so, nature of physical condition and duration, juror's wish/intention/efforts to return to the workplace.)
4. Is the proposed juror licensed to drive a motor vehicle? If so, for how long?
5. Does proposed juror have a commercial drivers license and/or any experience operating trucks or other types of commercial vehicles?
6. Whether proposed juror or close friend or family member was ever involved in or witness to a motor vehicle accident in which someone claimed personal injuries? If so, request brief description.
7. Was proposed juror or close friend or family member ever a plaintiff or defendant in a civil action? If so, request brief description.
8. Inquire as to proposed juror's hobbies and leisure time activities.
9. Can you assure the Court that you will follow its instructions and not permit sympathy for any party to affect your verdict?

Dated: Mamaroneck, New York
March 13, 2008

Respectfully submitted,

Mead, Hecht, Conklin & Gallagher, LLP
Attorneys for Defendant, JAMES COLLINS

By 
Elizabeth M. Hecht (8275)

109 Spencer Place
Mamaroneck, New York 10543
(914) 899-3100